

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

MARVEL MA	Plaintiff	)	
		)	
v.		)	
		)	
		)	Case No. 11-3048-CV-S-RTD
		)	
BOARD OF GOVERNORS OF	Defendant	)	
MISSOURI STATE UNIVERSITY		)	

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**PLAINTIFF'S EXHIBIT LIST**

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COME S NOW Marvel Ma, Plaintiff, Pro Se, and pursuant to the Court's September 5, 2014, Amended Scheduling and Pretrial Order, identifies the following exhibits to be used at the trial of this matter. Plaintiff reserves the right to use all exhibits identified by Defendant and to use other exhibits for impeachment and/or rebuttal purposes. Plaintiff also reserves the right to use at trial enlargements, reproductions, and demonstrative exhibits of any exhibit or portions of any exhibit identified by Plaintiff as a trial exhibit.

T = offered & admitted w/o objection	Ltd = admitted for limited purposes
Ex = offered, but objected to and excluded	X = offered & admitted over objection

DB = admitted, de bene				NO = marked, but not offered
				WD = offered then withdrawn
Exhibit Number	Action Taken	Date	Time	Description
P1				2003 Master Agreement between Missouri State University (“MSU”) and Liaoning Normal University (“LNU”)
P2				2009 Agreement between MSU and LNU
P3				Plaintiff’s 2006 Employment Contract
P4				Plaintiff’s 2007 Employment Contract
P5				Plaintiff’s 2008 Employment Contract
P6				Plaintiff’s 2009 Employment Contract
P7				Shepherd’s 2008 Employment Contract
P8				Shepherd’s 2009 Employment Contract
P9				Coutts’ 2008 Employment Contract
P10				Coutts’ 2009 Employment Contract
P11				Plaintiff’s 2006 Teaching Evaluations
P12				Plaintiff’s 2007 Teaching Evaluations
P13				Plaintiff’s 2008 Teaching Evaluations
P14				2009 MSU West Plains Faculty Ratings
P15				2007 MSU’s Faculty Handbook
P16				2007 – 2008 LNU-MSU COIB Business Faculty Handbook
P17				2008 – 2009 LNU-MSU COIB Business Faculty Handbook
P18				2009 – 2010 LNU-MSU COIB Business Faculty

				Handbook
P19				Spring 2010 LNU-MSU College of International Business Student Handbook
P20				LNU-MSU COIB Fall 2009 Instructor Supplementary Handbook
P21				2011 MSU Internal Audit of the COIB
P22				2008 – 2009 LNU-MSU COIB Operating Budget
P23				Picture of Michael Coutts
P24				Picture of Robert Nighoshian sleeping in class
P25				Printouts from MSU's website regarding Shepherd, Coutts, and Ma's status
P26				Student Petition to reinstate Plaintiff
P27				Article "An American College in China Struggles to Deliver" written by Paul Mooney
P28				Article "The Springfield - Dalian Connection" written by Brad Bodenhausen
P29				Article "China and the U.S: A Two Way Street" By Dr. Qingbiao Qu and Guangcai Dong
P30				Article "Preparing for the Future" By Dr. Jim Baker and Steve Robinette
P31				Nov. 22, 2000 Article "Educational agreement with Chinese university off to good start"
P32				Fall, 2009 Schedule Spreadsheet ("Fall_Schedule_Yr1n2_LNU_MSU.xls")
P33				Fall, 2009 COIB Faculty Orientation meeting PowerPoint presentation
P34				2007 handwritten card from Wittkorn to Plaintiff

P35				Nov. 23, 2009 letter from Dong to Plaintiff re: Plaintiff's termination
P36				Nov. 23, 2009 release letters from COIB
P37				Oct. 29, 2009 Plaintiff's first termination letter
P38				Oct. 29, 2009 Plaintiff's second termination letter
P39				June 22, 2010 APRC grievance resolution letter from Arden Miller
P40				Plaintiff's Missouri Commission on Human Rights (MCHR) discrimination complaint and response
P41				April 6, 2010 Grievances from Plaintiff to MSU's Academic Peer Review Commission
P42				Robinette's May 28, 2010 affidavit to MCHR
P43				Robinette's Aug. 28, 2013 affidavit
P44				Smart's June 4, 2010 letter to MCHR in response to Plaintiff's discrimination claim
P45				Coutts undated letter to Anderson
P46				Shepherd's Feb. 22, 2010 letter to Dong
P47				June 22, 2010 Response to Plaintiff's Grievances to MSU's Academic Peer Review Commission
P48				Translation of part of the COIB's translation of Plaintiff's email that was used in the Chinese trial
P49				Demonstrative Timeline of Events Prepared by Plaintiff
P50				Recording of a face-to-face meeting between Plaintiff and Dong
P51				Recording of phone conversation between Plaintiff and Dong

P52				Recording of the meeting between Coutts, Pederson, Hamilton, and Plaintiff
P53				Recording of the meeting between Smart, Baker, Robinette, Dong, and Plaintiff
P54				Recording of the meeting between Coutts, Cheong, and a Jingchao Lian
P55				Recording of the meeting between Cheong and Jingchao Lian
P56				Two (2) recording of the two meetings between Shepherd and Plaintiff
P57				May 3, 2006 – May 24, 2006 emails between Plaintiff, Zhang, and Miller re: Plaintiff's employment at the COIB
P58				Nov. 7, 2006 email from Dong re: health insurance
P59				Dec. 4, 2006 email from Wittkorn re: public speaking presentations
P60				Jan. 25, 2007 email from Wittkorn re: faculty evaluations
P61				June 25, 2007 email from McCarthy to Robinette re: Student's complaint of Robert Gard
P62				Oct. 7, 2007 emails between Wittkorn and Plaintiff re: unfair grading
P63				Apr. 8, 2008 email from Wittkorn and Plaintiff re: renewal of his contract
P64				June 23, 2008 email from Wittkorn to Robinette re: Job description for the associate dean
P65				Nov. 20, 2008 email from Wittkorn to COIB administrators re: Wittkorn's salary
P66				Dec. 21, 2008 – Dec. 22, 2008 emails between Robinette, Wittkorn, and Meinert re: Rachel Che's

				salary
P67				Dec. 25, 2008 – Dec. 30, 2008 emails between Robinette and Dong re: 2008 – 2009 Branch Campus Budgets
P68				Jan. 2, 2009 email from Dong to COIB re: new associate dean
P69				Jan. 2, 2009 email from Dong to Shepherd re: Shepherd's salary
P70				Jan. 5, 2009 – Jan. 7, 2009 emails between Shepherd and Robinette re: bank accounts
P71				Jan. 13, 2009 emails between Plaintiff and Shepherd re: accounting and shortage of teachers
P72				Feb. 6, 2009 email from Shepherd to Plaintiff and others re: book selection
P73				June 17, 2009 email from Shepherd to COIB re: contracts
P74				Jan. 17, 2009 - Jan. 18, 2009 emails between Plaintiff and Shepherd re: book selection
P75				Jan. 26, 2009 email from Meinert to McCoy re: Plaintiff's course evaluations
P76				Feb. 18, 2009 emails between Shepherd and Robinette re: Hiring of Carey
P77				March 2, 2009 – March 3, 2009 emails between Robinette and Hamilton re: 2010 budgets
P78				March 24, 2009 emails between Shepherd and Plaintiff re: meetings
P79				April 2, 2009 email from Robinette to Hui Tang about teaching at the COIB
P80				April 22, 2009 - May 12, 2009 emails between Robinette and Dong re: Information concerning your

				Dalian program
P81				Apr. 24, 2009 emails between Shepherd, Meinert, and others re: Keeping Dan in the loop
P82				May 2, 2009 email from Shepherd to Robinette re: Faculty Pay
P83				May 7, 2009 – May 8, 2009 emails between Robinette and Clymer re: teaching opportunity at the COIB
P84				June 2, 2009 emails between Robinette, Dong, and Shepherd re: contract problems
P85				June 13, 2009 email from Robinette to Wiseman re: enrollment of a student
P86				June 16, 2009 from Dong to Robinette re: faculty contracts
P87				June 16, 2009 and June 17, 2009 emails between Meinert and Shepherd re: Moses salary
P88				June 19, 2009 Shepherd's email to Robinette re: Lightner
P89				June 22, 2009 – June 24, 2009 emails between Robinette and Dong re: Study in the USA draft coverage with trip to Chicago
P90				June 24, 2009 – June 25, 2009 emails between Robinette and Dong re: hiring of Hamilton and Lightner as associate dean
P91				June 26, 2009 emails between Shepherd, Robinette, and Nyden re: Pay Resolution
P92				June 30, 2009 – July 1, 2009 emails between Robinette and Shepherd re: A thought about Accounting in the next two weeks
P93				July 7, 2009 - July 8, 2009 emails between Shepherd and Meinert re: Revised Curriculum and Pushing One

				Course to 5 <sup>th</sup> semester
P94				July 8, 2009 email from Meinert to Robinette and Ragan re: 5 <sup>th</sup> Semester FA09 and Beyond
P95				July 10, 2009 – July 25, 2009 emails between Che, Shepherd, and Meinert re: Che's salary
P96				July 12, 2009 – July 13, 2009 emails between Shepherd and Robinette re: setting up a FGB 284 class
P97				July 26, 2009 email from Shepherd to Robinette re: future teaching at MSU/LNU
P98				Aug. 16, 2009 email from Shepherd to Robinette re: Fred Jennings
P99				Aug. 19, 2009 – Sept. 1, 2009 emails between Shepherd and Plaintiff re: scheduling of Plaintiff's courses
P100				Aug. 31, 2009 emails between Shepherd, Robinette, and Morrill re: Accounting course
P101				Aug. 31, 2009 email from Gong to Ogletree re: registration of Plaintiff's courses
P102				Aug. 31, 2009 - Jan. 5, 2010 emails between Shepherd and Robinette re: Plaintiff's classes s
P103				Sept. 2, 2009 email from Shepherd to COIB re: meeting new students.
P104				Sept. 13, 2009 – Sept. 15, 2009 emails between Robinette to Dong re: Dong's salary
P105				Sept. 15, 2009 email from Plaintiff to Robinette re: request for a meeting
P106				Sept. 27, 2009 to Oct. 2, 2009 emails between Dong and Ma
P107				Oct. 2, 2009 – Oct. 13, 2009 emails between Shepherd, Hamilton, and Coutts re: Plaintiff's



				absences
P108				Oct. 12, 2009 email from Shepherd to Morrill re: Contract idea
P109				Oct. 12, 2009 email from Shepherd to Nigohosian re: Suggestion economics faculty replacement
P110				Oct. 25, 2009 emails between Plaintiff and Shepherd regarding Plaintiff's compensation
P111				Oct. 26, 2009 email from Meinert to Coutts re: CIS205 Syllabus
P112				Oct. 27, 2009 email from Coutts to Shepherd and Robinette re: Plaintiff's termination
P113				Oct. 27, 2009 email from Robinette to Dong re: Shepherd's resignation
P114				Oct. 27, 2009 emails between Coutts and Robinette re: Plaintiff
P115				Oct. 28, 2009 emails from Shepherd and Robinette re: Shepherd's resignation
P116				Oct. 29, 2009 – Nov. 1, 2009 emails between Plaintiff and Coutts re: his termination, contract, request for meeting, and visa
P117				Oct. 29, 2009 emails between Coutts and Shepherd re: Plaintiff's contract
P118				Oct. 29, 2009 email from Coutts to Shepherd and Robinette re: Plaintiff's contract
P119				Oct. 29, 2009 email from Shepherd to Coutts re: Plaintiff
P120				Oct. 30, 2009 – Nov. 1, 2009 emails re: direct deposit
P121				Oct. 30, 2009 – Nov. 1, 2009 emails between Hamilton, Robinette, and dong re: Warner's pay

P122				Nov. 2, 2009 emails from Robinette and Pederson re: not responding to Plaintiff
P123				Nov. 2, 2009 – Nov. 16, 2009 emails between Plaintiff, Robinette, Pederson, and others re: request for documentation regarding alleged absences
P124				Nov. 2, 2009 – Nov. 15, 2009 emails from Plaintiff to Dong, Coutts, and others re: October's pay
P125				Nov. 2, 2009 email from Robinette to Dong re: withholding Plaintiff's pay
P126				Nov. 3, 2009 emails between Dong and Robinette re: Coutts salary
P127				Nov. 11, 2009 emails between Robinette and Dong re: direct deposit for COIB employees
P128				Nov. 16, 2009 – Nov. 17, 2009 emails between Coutts, Dong, and Robinette re: Pederson's salary
P129				Nov. 23, 2009 email from Wittkorn to Robinette and Dong re: Stecz
P130				Nov. 30, 2009 email from Robinette to Coutts re: Plaintiff's October's pay
P131				Nov. 30, 2009 – Dec. 3, 2009 emails between Robinette, Dong, Coutts, and Plaintiff re: his October's pay, salary and termination
P132				Dec. 8, 2009 – Dec. 19, 2009 emails between Dong and Plaintiff re: LNU's president contact info
P133				Dec. 18, 2009 emails between Plaintiff, Robinette, and Smart re: final letter
P134				Dec. 21, 2009 email from Plaintiff to Baker, Meinert, and others re: final appeal
P135				Dec. 21, 2009 emails between Robinette and Dong re: Teacher Contracts

P136				Dec. 22, 2009 – Feb. 2, 2010 emails between Meinert and Plaintiff re: teaching evaluations
P137				Dec. 22, 2009 – Dec. 24, 2009 emails between Robinette and Dong re: Wittkorn's salary
P138				Dec. 22, 2009 email from Dong to Baker, Meinert, and Robinette re: Plaintiff's final appeal
P139				Dec. 22, 2009 email from Morrill to Robinette re: Contracts/Visas
P140				Dec. 22, 2009 – Dec. 23, 2009 emails between Coutts, Robinette, and Dong re: Coutts as associate dean
P141				Dec. 23, 2009 emails between Robinette and Dong re: Nigohosian's salary
P142				Dec. 28, 2009 emails between Robinette and Dong re: Academic Center Tutor Salaries
P143				Dec. 28, 2009 email from Dong to Robinette Coutts, Bakers, and others regarding collecting evidence of Plaintiff's absences
P144				Dec. 23, 2009 – Jan. 16, 2010 emails between Plaintiff, Dong, Baker re: reminder for final decision
P145				Jan. 4, 2010 email from Plaintiff to Coutts, Robinette, and others re: CIS 232 grading policy
P146				Jan. 8, 2010 email from Plaintiff to his former students
P147				Jan.10, 2010 emails between Plaintiff, Robinette, Coutts, and others re: CIS 232 grading
P148				Jan. 20, 2010 – Feb. 2, 2010 emails between Plaintiff, MSU Human Resources, and Dong re: his personnel records
P149				Jan. 20, 2010 email from Plaintiff to Baker, Robinette, and others re: intent to file adverse employment grievance

P150				Feb. 10, 2010 – Feb. 11, 2010 emails between Dong and Coutts re: Plaintiff's termination
P151				Feb. 12, 2010 emails between Coutts and Shepherd re: Marvel Ma Documentation and statement
P152				Feb. 12, 2010 emails between Coutts, Shepherd, and Dong re: Marvel has appealed for arbitration
P153				Feb. 19, 2010 email from Coutts to Robinette re: Meeting with Dean Dong
P154				Feb. 23, 2010 – Feb. 24, 2010 emails between Robinette and Coutts re: faculty orientation schedule and handbook
P155				March 3, 2010 – March 14, 2010 emails between Meinert, Robinette, and Dong re: Plaintiff's reinstatement and upcoming visit
P156				March 11, 2010 – April 10, 2010 emails between Plaintiff, Dong, Smart, and others re: March 8, 2010 offer
P157				March 16, 2010 emails between Robinette, Coutts, and Dong re: proposed faculty for sy2010
P158				March 24, 2010 email from Robinette to Dong re: Plaintiff's settlement
P159				April 29, 2010 emails between Plaintiff and Dong re: more meetings
P160				Aug. 29, 2010 email from Baker to Robinette re: Coutts' behavior
P161				April 29, 2010 emails between Robinette and Dong re: Plaintiff's relationship with a student
P162				April 30, 2010 emails between Robinette and Shepherd re: problems with Plaintiff
P163				May 16, 2010 – May 17, 2010 emails between

				Plaintiff and COIB staff re: request for release letter
P164				May 20, 2010 email from Plaintiff to MSU President and others re: Final Opportunity to Intervene
P165				June 2, 2010 emails between Robinette and Hamilton re: student statements about Plaintiff
P166				June 3, 2010 – June 10, 2010 emails between Plaintiff and Woodward re: ARPC and PPRP grievances
P167				June 6, 2010 – Aug. 2, 2010 emails between MSU's Academic Peer Review Commission and Plaintiff re: Conclusions of the APRC
P168				June 10, 2010 email from Plaintiff to Robinette and Dong re: matters relating to the trial
P169				June 14, 2010 – Aug. 2, 2010 emails between Miller and Plaintiff re: grievance process
P170				July 10, 2010 email from Hardisty to MSU president re: inappropriate behavior at the COIB
P171				July 13, 2010 – July 16, 2010 emails between Robinette and Dong re: Coutts behavior
P172				Aug. 4, 2010 email from Robinette to Dong re: Plaintiff's visa
P173				March 21, 2011 email from Robinette to Dong re: Plaintiff's lawsuit

Respectfully submitted,

/s/ *Marvel Ma*

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Marvel Ma

Pro se

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### **Certificate of Service**

The undersigned hereby certifies that on this sixth day of October, 2014, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record. In addition, the foregoing was served by electronic mail upon the following:

- Ian Paul Cooper (icooper@tuethkeeney.com)
- Mollie Hennessee (mhennessee@tuethkeeney.com)
- Ryan DeBoef (ryandeboef@missouristate.edu)

Dated 10-06-2014

*/s/ Marvel Ma*

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Pro se